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6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

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8 UNITED STATES OF AMERICA,

9 Plaintiff,

10 vs.

11 PETER AKARAGIAN,

12 Defendant.
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CASE NO.: 2:13-CR-00039-JAD-VCF

14 **STIPULATION TO CONTINUE PRETRIAL MOTIONS DEADLINE**
15 **(11th REQUEST)**

16 IT IS HEREBY STIPULATED by and between PETER AKARAGIAN, Defendant, by
17 and through his counsel ANTHONY P. SGRO, ESQ., and the UNITED STATES OF AMERICA,
18 by and through J. GREGORY DAMM, Assistant United States Attorney, and RAMON
19 DESAGE, by and through, RICHARD B. HERMAN, ESQ., and GARY PARKINSON, by and
20 through THOMAS F. PITARO, ESQ., that the October 1, 2015, Motions deadline date be
21 continued thirty (30) days, or to a time convenient to this Honorable Court.
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1 This stipulation is entered into based on the following:

- 2 1. Counsel for Defendant Peter Akaragian recently had a change in personnel.
3 Specifically, the associate primarily responsible for this case is no longer with the
4 firm.
- 5 2. Counsel for Defendant Akaragian has spoken with AUSA Gregory Damm, and the
6 Government has no objection to the requested continuance.
- 7 3. Counsel has spoken to the co-defendants' counsel and the co-defendants have no
8 objection to the continuance.
- 9 4. Failure to grant this request for continuance would deny the Defendant the opportunity
10 to properly present his case at trial and the opportunity to negotiate a resolution.
- 11 5. Additionally, continuance of the current Pre-Trial Motions date is appropriate in order
12 to promote the goals set forth under 18 U.S.C. § 3161(h)(7)(A), which provides that a
13 court may grant a continuance on the basis of finding that the "ends of justice" served
14 by a continuance outweigh the best interest of the public and the defendant in a speedy
15 trial.
- 16 6. Additionally, denial of this request for continuance would result in a miscarriage of
17 justice.

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

PETER AKARAGIAN,

Defendant.

CASE NO.: 2:13-CR-00039-JAD-VCF

**STIPULATION TO CONTINUE PRETRIAL
MOTIONS**

FINDINGS OF FACT

Based on the pending Stipulations of the parties, and good cause appearing therefor, the Court finds that:

1. Counsel for Defendant Peter Akaragian recently had a change in personnel. Specifically, the associate primarily responsible for this case is no longer with the firm.
2. Counsel for Defendant Akaragian has spoken with AUSA Gregory Damm, and the Government has no objection to the requested continuance.
3. Counsel has spoken to the co-defendants' counsel and the co-defendants have no objection to the continuance.

CONCLUSIONS OF LAW

1. Failure to grant this request for continuance would deny the Defendant the opportunity to properly present his case at trial and the opportunity to negotiate a resolution.
2. Additionally, denial of this request for continuance would result in a miscarriage of justice.

ORDER

DATED this 25th day of September, 2015.

UNITED STATES DISTRICT JUDGE